

UNITED STATES DISTRICT COURT
for the
District of Delaware

James et al)	
Plaintiff)	
v.)	Civil Action No. 1:23-cv-00591-GBW
Honors Holdings, LLC)	
Defendant)	

CLERK'S CERTIFICATION OF A JUDGMENT TO BE REGISTERED IN ANOTHER DISTRICT

I certify that the attached judgment is a copy of a judgment entered by this court on (date) 09/29/2023.

I also certify that, as appears from this court's records, no motion listed in Fed. R. App. P. 4(a)(4)(A) is pending before this court, the time for appeal has expired, and no appeal has been filed or, if one was filed, it is no longer pending.

Date: 10/03/2023

CLERK OF COURT


Signature of Clerk or Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROBERT SCOT JAMES
and CORE2000 LLC,

Plaintiffs,

v.

HONORS HOLDINGS, LLC,

Defendant.

C.A. No. 1:23-cv-00591-GBW

PROPOSED STIPULATED FINAL JUDGMENT

WHEREAS, on May 31, 2023, Plaintiffs Robert Scot James and Core2000 LLC (collectively, "Plaintiffs") filed their Complaint against Defendant Honors Holdings, LLC ("Honors") in the above-captioned action, alleging breach of an asset purchase agreement dated as of May 16, 2022 (the "Agreement"), and seeking damages in the principal amount of \$5,500,000, as well as pre- and post-judgment interest pursuant to the parties' contractually agreed-upon rate, and Plaintiffs' attorneys' fees (D.I. 1);

WHEREAS, on July 21, 2023, Honors filed its Answer and Affirmative Defenses to Complaint (D.I. 8);

WHEREAS, on August 22, 2023, following discussions between the parties regarding resolution of this matter, Honors provided Plaintiffs with a draft offer of judgment, which was intended to provide a basis for discussion of an entry of judgment in this matter and was not intended to be a formal offer of judgment pursuant to Federal Rule of Civil Procedure 68;

WHEREAS, on August 23, 2023, Plaintiffs provided comments to the draft offer of judgment, and the parties further discussed resolution of this action via a stipulated final judgment;

WHEREAS, the parties, through their respective counsel, hereby agree to the entry of this Stipulated Final Judgment, subject to the approval of the Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED, ORDERED AND ADJUDGED:

1. Judgment is entered for Plaintiffs and against Honors on the claims asserted in Plaintiffs' Complaint, in the amount of \$5,947,533.00 (five million, nine-hundred and forty-seven thousand, five-hundred and thirty-three dollars), which shall constitute the principal amount of Plaintiffs' claim, plus pre-judgment interest accrued as of September 28, 2023.
2. Judgment is also entered for Plaintiffs and against Honors with regard to Plaintiffs' attorneys' fees, to which Plaintiffs are entitled pursuant to the parties' Agreement, in the additional amount of \$85,000.00 (eighty-five thousand dollars).
3. Post-judgment interest shall continue to accrue on the amount set forth in Paragraph 1 above at the contractual rate of 15% per annum until paid in full.
4. This Stipulated Final Judgment resolves all claims that were asserted, or could have been asserted, by Plaintiffs against Honors, and all claims that could have been asserted by Honors against Plaintiffs, in this action or in connection with the underlying transaction.
5. Honors waives any right to appeal from this Stipulated Final Judgment.
6. Honors waives the 30-day automatic stay of proceedings set forth in Fed. R. Civ. P. 62 for Plaintiffs to enforce this Stipulated Final Judgment.

7. Upon entry of this Stipulated Final Judgment, this action is dismissed with prejudice, provided, however, that this Court shall retain jurisdiction to enforce the terms and conditions of this Stipulated Final Judgment.

POTTER ANDERSON & CORROON LLP

By: /s/ John A. Sensing
John A. Sensing (#5232)
Hannah L. Paxton (#7096)
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Attorneys for Plaintiffs

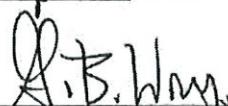
Dated: September 28, 2023

BERGER HARRIS LLP

By: /s/ Richard I.G. Jones, Jr.
Richard I.G. Jones, Jr. (#3301)
Peter C. McGivney (#5579)
1105 Market Street, 11th Floor
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pmcgivney@bergerharris.com

Attorneys for Defendant

SO ORDERED this 29th day of September, 2023.


The Honorable Gregory B. Williams

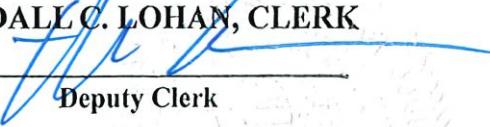
OCT 03 2023
CERTIFIED:

AS A TRUE COPY: OCT 03 2023

ATTEST:

RANDALL C. LOHAN, CLERK

BY


Deputy Clerk

U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:23-cv-00591-GBW

James et al v. Honors Holdings, LLC
Assigned to: Judge Gregory B. Williams
Demand: \$5,500,000
Cause: 28:1332 Diversity-Breach of Contract

Date Filed: 05/30/2023
Date Terminated: 09/29/2023
Jury Demand: None
Nature of Suit: 190 Contract: Other
Jurisdiction: Diversity

Plaintiff**Robert Scot James**

represented by **John Anderson Sensing**
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Plaintiff**Core2000 LLC**

represented by **John Anderson Sensing**
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Hannah Paxton

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V.

Defendant**Honors Holdings, LLC**

represented by **Peter C. McGivney**
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Date Filed	#	Docket Text
05/30/2023	1	COMPLAINT filed against Honors Holdings, LLC (Filing fee \$ 402, receipt number ADEDC-4147373.) - filed by Robert Scot James, Core2000 LLC. (Attachments: # 1 Civil Cover Sheet)(twk) (Entered: 05/31/2023)
05/30/2023	2	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (twk) (Entered: 05/31/2023)
05/30/2023	3	Disclosure Statement pursuant to Rule 7.1: No Parents or Affiliates Listed filed by Core2000 LLC. (twk) (Entered: 05/31/2023)
05/30/2023		No Summons Issued. (twk) (Entered: 05/31/2023)
06/01/2023	4	SUMMONS Returned Executed by Robert Scot James, Core2000 LLC.Honors Holdings, LLC served on 5/31/2023, answer due 6/21/2023. (Sensing, John) (Entered: 06/01/2023)
06/07/2023		Case Assigned to Judge Gregory B. Williams. Please include the initials of the Judge (GBW) after the case number on all documents filed. (rjb) (Entered: 06/07/2023)
06/15/2023	5	NOTICE of Appearance by Peter C. McGivney on behalf of Honors Holdings, LLC (McGivney, Peter) (Entered: 06/15/2023)
06/15/2023	6	NOTICE of Appearance by Richard I.G. Jones, Jr on behalf of Honors Holdings, LLC (Jones, Richard) (Entered: 06/15/2023)
06/15/2023	7	STIPULATION TO EXTEND TIME to respond to Complaint to July 22, 2023 - filed by Honors Holdings, LLC. (McGivney, Peter) (Entered: 06/15/2023)
06/16/2023		SO ORDERED, re 7 STIPULATION TO EXTEND TIME to respond to Complaint to July 22, 2023 filed by Honors Holdings, LLC. Signed by Judge Gregory B. Williams on 6/16/2023. (etg) (Entered: 06/16/2023)
07/21/2023	8	ANSWER to 1 Complaint [<i>Answer and Affirmative Defenses to Complaint</i>] by Honors Holdings, LLC.(Jones, Richard) (Entered: 07/21/2023)
07/21/2023	9	Disclosure Statement pursuant to Rule 7.1: identifying Other Affiliate HH Holdco, Inc. for Honors Holdings, LLC filed by Honors Holdings, LLC. (Jones, Richard) (Entered: 07/21/2023)

08/07/2023	10	NOTICE OF SERVICE of Plaintiffs' First Set of (1) Interrogatories; and (2) Requests for Production of Documents to Defendant Honors Holdings, LLC (served on 08/03/2023) filed by Core2000 LLC, Robert Scot James.(Sensing, John) (Entered: 08/07/2023)
09/28/2023	11	Joint PROPOSED ORDER Stipulated Final Judgment re 1 Complaint by Core2000 LLC, Robert Scot James. (Sensing, John) (Entered: 09/28/2023)
09/29/2023	12	STIPULATED FINAL JUDGMENT in favor of Core2000 LLC, Robert Scot James against Honors Holdings, LLC in the amount of \$5,947,533 plus \$85,000 for attorneys' fees (CASE CLOSED). Signed by Judge Gregory B. Williams on 9/29/23. (ntl) (Entered: 09/29/2023)

PACER Service Center			
Transaction Receipt			
10/06/2023 15:07:10			
PACER Login:	nmrs0003	Client Code:	060071/01500-FA1
Description:	Docket Report	Search Criteria:	1:23-cv-00591-GBW Start date: 1/1/1975 End date: 10/6/2023
Billable Pages:	2	Cost:	0.20

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

VIII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P. Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

Date and Attorney Signature. Date and sign the civil cover sheet.